

From: [John Hebert](#)  
To: [Jennifer Gaines](#)  
Cc: [Dan Peacock](#)  
Subject: Re: Use Site Limitations  
Date: 07/22/2010 08:07 AM

---

(Dan - I actually wrote this yesterday but forgot to send it....)

Dan - I think the proposed language is fine. Please share it with PRD/ScottG. Also, Jen and I were discussing that it also makes sense to only include the AG boilerplate for products with AG uses and the PMP boilerplate for products with PMP uses. Also, for second generation products it gets more complicated if there both AG and PMP uses. The 8lb. AG size limitation conflicts with what we allow for PMPs to purchase. Just something to pay attention to when you're reviewing labels.....

Thanks for all the followup.

john

▼ Jennifer Gaines---07/21/2010 10:18:09 AM---Hi Dan and John, I'm going to agree with both Johns on including some kind of wording for the PCO

From: Jennifer Gaines/DC/USEPA/US  
To: Dan Peacock/DC/USEPA/US@EPA  
Cc: John Hebert/DC/USEPA/US@EPA  
Date: 07/21/2010 10:18 AM  
Subject: Re: Use Site Limitations

---

Hi Dan and John,

I'm going to agree with both Johns on including some kind of wording for the PCO market, and I think the addition that John L. provides (highlighted below) is very helpful. It looks like from his edit, he doesn't mind if the ag consumer language is left on just so long as the PCOs are addressed. So to add another question (yippee!), for those products just for PCO use, should we leave the ag consumer statement in addition to the "pest management professionals" statement, OR remove the ag consumers statement which just leaves the "Pest Management Professionals" statement?

Jen

Jennifer Gaines  
Wildlife Biologist  
U.S. Environmental Protection Agency  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Tel: 703 305-5967  
Fax: 703 305-6309

▼ Dan Peacock---07/21/2010 10:11:48 AM---John, Thanks for clarifying the change that you were seeking. I indicated that it would help us i

From: Dan Peacock/DC/USEPA/US  
To: "John Lublinkhof" <jlublinkhof@belllabs.com>  
Cc: John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA  
Date: 07/21/2010 10:11 AM  
Subject: Re: Use Site Limitations

---

John,

Thanks for clarifying the change that you were seeking. I indicated that it would help us if you suggested the specific text that you would find acceptable, provided below, with new text highlighted.

This product is prohibited for Sale in Stores Oriented  
towards  
Residential Consumers: Grocery, Drug, Hardware and Home  
Improvement.  
This product is acceptable for Sale in Stores Oriented toward  
**Pest Management Professionals and**  
Agricultural Consumers: Farm, Agricultural, Tractor Stores.

We will let you know if the modified text is acceptable.

Daniel B. Peacock, Biologist  
Tel: 703-305-5407  
Fax: 703-308-0029  
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide  
Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,  
Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration  
Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive,  
Arlington, VA 22202

▼ "John Lublinkhof" ---07/08/2010 03:55:35 PM---Dear Dan, Recently, you sent me a number of approved amended labels. These are:

From: "John Lublinkhof" <jlublinkhof@belllabs.com>  
To: Dan Peacock/DC/USEPA/US@EPA  
Cc: John Hebert/DC/USEPA/US@EPA  
Date: 07/08/2010 03:55 PM

Dear Dan,

Recently, you sent me a number of approved amended labels. These are:

12455-95, -96, -97, -5, -14, -80, -81, and -83

On all of these, under "Terms and Conditions, you indicate:

"This product is prohibited for Sale in Stores Oriented towards Residential Consumers: Grocery, Drug, Hardware and Home Improvement.

This product is acceptable for Sale in Stores Oriented toward Agricultural Consumers: Farm Agricultural, Tractor Stores."

The only issue is that the professional PCO market isn't listed.

In addition to agricultural uses, the above products are to be sold in the professional market which includes commercial buildings, industrial buildings, homes etc. My concern is that state regulatory agencies often look at this very closely and may not allow use in the professional segment.

Is there a way you can provide a letter or revise the cover letters for the above products to include the professional segment?

Thanks,

John Lublinkhof  
Bell Laboratories, Inc.  
608-241-0202 Ext. 3138